

APR 06 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article Number P - 716 387 417

Mr. Jim Gilbert
Plant Manager
Norplex/Oak, Inc.
NE County Road
P.O. Box 370
Postville, IA 52162



R00330182
RCRA RECORDS CENTER

Re: Norplex/Oak, Inc.
EPA ID Number IAD073489288

REQUEST FOR INFORMATION

Dear Mr. Gilbert:

On June 7, 1988 an authorized representative of the United States Environmental Protection Agency (EPA) inspected Norplex/Oak, Inc. That inspection was conducted pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 United States Code of Regulations (U.S.C.) Section 6927. The purpose of that inspection was to determine Norplex/Oak's compliance status with respect to the hazardous waste regulations.

At the end of the inspection, the inspector issued you a Notice of Violation for the following violations:

- | | |
|------------------|---|
| 40 CFR 265.16(d) | Failure to identify each employee, their job position, and document employee hazardous waste training |
| 40 CFR 262.34 | Failure to date and label hazardous waste in storage |
| 40 CFR 265.35 | Failure to keep adequate aisle space between drums in storage |

WSTM/RCRA/IOWA/MITCHELL/disk2/NORPLEX

IOWA
MITCHELL

IOWA
CALLIER

IOWA
FLOURNOY

RCRA
MORBY

WSTM
WAGONER

Mitchell

Callier
4/3/89

Flournoy
4/13/89

Morby
4/13/89

Wagoner
4/13/89

- | | |
|------------------|---|
| 40 CFR 265.171 | Failure to store hazardous waste in a safe manner |
| 40 CFR 262.11 | Failure to make a hazardous waste determination on open drums in storage |
| 40 CFR 268.7(a) | Failure to provide Land Disposal Restriction notices with shipments of hazardous wastes |
| 40 CFR 262.42(a) | Failure to have returned manifests |

Your June 15, 1988 response to the NOV has been reviewed and determined to have adequately addressed the cited violations. However, my staff, after reviewing the inspection report, has determined that you may also be in violation of 40 CFR 266. In order for us to determine if you are in violation of 40 CFR 266, you will need to supply us with additional information.

Section 3007 of RCRA, 42 U.S.C. Section 6927, allows the EPA to request certain information for the purpose of determining compliance with the the Federal hazardous waste regulations. Pursuant to the provisions of Section 3007 of RCRA, we hereby request that you provide the following information:

1. The inspection report noted that you ship your used oil (hydraulic and lubricating oil) off site. Please describe the process which generates the used oil.
2. The inspection report noted that you send your used lubricating oil to Rock Oil Company, which is located in Wisconsin, and your used hydraulic oil to S & S Industrial Services, which is also located in Wisconsin. Please describe how each respective used oil receiver uses your used oil (i.e. is it burned, reclaimed, etc.).

Failure to respond to this letter within thirty days of receipt could subject your facility to an enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. Section 6928. Such enforcement action may include the assessment of up to \$25,000 per day of non-compliance. Our Agency will review your response to this letter along with the information contained in our files to determine what, if any, subsequent enforcement action is warranted.

Norplex/Oak, Inc. may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the

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Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by means authorized by the procedures specified in 40 CFR Part 2, Subpart B. If no such claim is made when information is received by EPA, information may be made available to the public without further notice.

Your response should be sent to the Environmental Protection Agency, Region VII, 726 Minnesota Avenue, Kansas City, Kansas 66101, Attention: Mr. Brian Mitchell, RCRA/IOWA. If you should have questions concerning this letter, you may contact Mr. Mitchell at 913/236-2887.

Sincerely yours,

David A. Wagoner
Director Waste Management
Division

cc: Pete Hamlin, IDNR
bcc: Bob Dona, EMCM/ENSV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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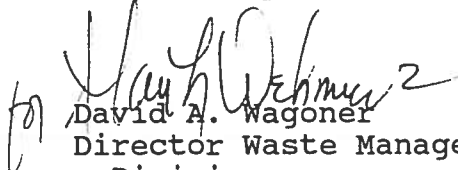
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Sincerely yours,


David A. Wagoner
Director Waste Management
Division

cc: Pete Hamlin, IDNR

Complete Items 1 and 2 when additional services are requested. Complete Items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. ☐ Restricted Delivery
↑ (Extra charge) ↑

3. Article Addressed to:
Mr. Jim Gilbert
Plant Manager
Norpley / Oak, Inc.
N.E. County Rd
P.O. Box 370
Pesterville, Pa 52160

4. Article Number
P716 387 417

Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X J. Bobrow N10

7. Date of Delivery
4-10-89 mm

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT

P 716 387 417

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

70

Sent to
Jim Gilbert, Plant Mgr

Street and No.
N.E. County Rd Box 370

P.O., State and ZIP Code
Pesterville Pa 52160

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985